

Exhibit 520

PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

Case No.: 4:22-md-03047-YGR
MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

Affidavit of Monika Davis

1. My name is Monika Davis, and I make this declaration based on my personal knowledge.
2. I received a Bachelor of Arts degree in 1995 from Georgia State University, a Master of Science in Instructional Technology in 1998 from Georgia State University, and a Master of Education in Educational Leadership in 2003 from Georgia State University.
3. I have 30 years of experience working in Pre-K-12 education information technology.
4. I was Chief Information Officer at DeKalb County School District from 2020 to 2024.
5. Prior to my role as CIO, I served in multiple information technology roles for DeKalb County School District. I joined the District in 1994.
6. In my role as Chief Information Officer, I provided overall leadership for the District's information technology department, managed the IT department's budget, and oversaw the District's information infrastructure, including its filter/firewall systems.
7. DeKalb County School District uses the Lightspeed system to filter content on its network and District-issued laptops. This system blocks access to social media platforms on the network and laptops. However, this system provides only limited information regarding attempts by students to bypass the firewall/filter system in order to access social media while at school. The system cannot block students from accessing social media on their personal computers or phones using their own hotspots or data.
8. Currently, addressing the effects of social media on students is one of the biggest challenges we address as information technology staff in the DeKalb County School District. Accordingly, a substantial amount of my work time, and the work time of my colleagues in the IT department, was spent addressing the fallout of social media's negative impact on students and

attempts to access social media on school networks and laptops during the day when students should be learning.

9. In my experience, I have seen a growing problem of addictive, compulsive, and problematic social media use among our students. We face a constant battle in separating students from their phones as students are unable to regulate or control their use of social media. Teachers, principals, and other staff who work in schools consistently reported that students were attempting to access social media during the school day by bypassing the firewall or using a proxy site.

10. I have also observed an alarming rise in attempts by students to bypass Lightspeed to access social media. When the District began distributing laptops to students in 2017, we had to put time and effort toward issuing Internet Connectivity Agreements and Internet Usage Agreements, as well as social media guidelines, so students would know that use of the laptops was strictly limited to educational purposes. Despite this, and despite the District's tightening of regulations on social media access, I consistently received emails, phone calls, and visits from teachers and principals reporting students' attempts to bypass Lightspeed or download or access inappropriate apps or websites on Chromebooks during the day. This was a consistent problem during my tenure, and by the time I retired in November 2024, these reports had only increased in frequency.

11. Ultimately, there are numerous negative effects of social media on the District. These effects include, but are not limited to, excessive use of social media which impacts the functioning of the IT department on a daily basis, forces the IT department to divert time away from its daily duties, and collaborate with teachers and schools to ensure that the firewall is working properly and that problems are fixed so that students cannot access social media during the school day.

12. I have observed the negative impacts of social media addiction on the District. For instance, the District has had to install multiple layers of protection on its network and school-issued laptops

in order to prevent students from accessing social media while using that technology. The District has gone to great lengths, and incurred great expenses over the years, to purchase, install, and maintain these systems, in addition to providing rules and guidelines for proper use of technology as referenced above.

13. The problems associated with students accessing social media at school have only increased as time has passed. Naturally, this has led to an increase in the amount of time that must be spent to stay ahead of the problem. For example, for each instance of a student accessing social media beyond the firewall (or attempting to), the IT department has to research the problem, often visit the school where the attempt occurred, interview teachers and students with knowledge of the problem, analyze the computer at issue, and create a solution to prevent the same occurrence from happening at another school. Often, we had to take time to collaborate with other divisions such as Wraparound Services or Public Safety if their involvement was necessary based on the nature of the attempt. This takes valuable time and effort away from IT's daily responsibilities, and because a substantial part of my day became addressing social media impacts on students, I had less time to dedicate to other aspects of my job.

14. The time that I have had to spend on social media related impacts on students has substantially increased in many years that I have worked in information technology management at DeKalb County School District.

15. When I became interim CIO in October 2018, approximately 5% of IT work time was spent on social media related concerns. By the time I retired in November 2024, IT personnel estimates it spent 30% of its work time addressing and managing students' attempting to bypass Lightspeed to access prohibited material, including social media, and ensuring the District's information infrastructure sufficiently blocked social media. 30% of Lightspeed costs are related to the District's attempts to block and/or limit social media.

16. While having additional IT engineers and technology would be helpful in addressing the negative impacts that the rising use of social media has had on students, the DeKalb County School District has not been able to increase hiring commiserate with the needs of the student population that has been negatively impacted by social media due to funding constraints.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 16, 2025.



Monika Davis